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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LOOP AI LABS INC., a Delaware
corporation

Plaintiff,

vs.

ANNA GATTI, an individual, ALMAVIVA
S.p.A., an Italian corporation,
ALMAWAVE S.r.l., an Italian corporation,
ALMAWAVE USA, Inc., a California
corporation, IQSYSTEM LLC, a California
limited liability company, IQSYSTEM, Inc.,
a Delaware corporation,

Defendants.

Case No. 3:15-cv-00798 HSG

**DECLARATION OF GENNARO DI
NAPOLI IN IN SUPPORT OF
OPPOSITION TO PLAINTIFF'S *EX
PARTE* MOTION FOR
(1) TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE RE PRELIMINARY
INJUNCTION;
(2) ASSET RESTRAINING ORDER;
(3) EXPEDITED DISCOVERY ORDER;
AND
(4) ALTERNATIVE SERVICE OF
PROCESS ON ALMAVIVA S.P.A. AND
ALMAVIVA S.R.L. AND RELATED
RELIEF**

I, Gennaro Di Napoli, declare as follows:

1. I am the founder and President of IQSystem, Inc., a defendant in the above-captioned case. I have personal knowledge of the facts below, and if called to testify, can and will competently do so.

2. I have reviewed and I am familiar with the pleadings filed by Loop AI Labs, Inc. (“Loop AI”) in this case, including Loop AI’s motion for temporary restraining order. Any such order, if entered, would have disastrous consequences for IQ System, Inc.

3. IQSystem, Inc. was incorporated on April 10, 2014 under the laws of Delaware.

4. IQSystem, Inc. provides technical consulting and business development to semiconductor industry players on a global level. In order to fulfill a wide range of customer needs, IQSystem, Inc. employs a team of scientists, engineers and analysts working in different areas of the design and fabrication of semiconductor devices, as well as a team of Business Development Contractors specialized in semiconductor manufacturing process technologies.

5. I do not know what Loop AI's business consists in. I had never heard of Loop AI before Loop AI filed its pleadings in this case against IQSystem, Inc.

6. IQSystem, Inc. currently employs eighteen (18) individuals who depend on IQSystem, Inc. as their main source of income. These individuals are assigned to their respective accounts and often work on the client's site.

7. IQSystem, Inc. pays these 18 individuals a salary, as well as their business expenses related to travel, room and board when they work at the client's site. If Loop AI's motion were granted and IQSystem, Inc.'s assets were frozen, IQSystem, Inc. would no longer be able to pay these employees.

8. I hereby declare that I understand and I am fluent in the English language to the extent that I understand the content of this declaration upon signing.

Executed under penalty of perjury according to the laws of California on the 9th day of March, 2015 in Milan, Italy. 

By: Gennaro Di Napoli